

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SUSTAINABLE FIBER TECHNOLOGIES
LLC, a Nevada limited liability company,

Plaintiff,

v.

DARBY KREITZ, an individual, ALLNORTH
CONSULTANTS LTD., a Canadian limited
company; ALLNORTH AMERICAS INC., a
Nevada corporation; RED LEAF FIBRE LTD.,
a Canadian limited company; and RED LEAF
PULP, LTD., a Canadian limited company,

Defendants.

CASE NO. 2:22-cv-00822-MJP

**STIPULATION AND ORDER FOR
SECOND EXTENSION OF THE TIME
FOR DEFENDANTS TO RESPOND TO
PLAINTIFF’S COMPLAINT**

**NOTE ON MOTION CALENDAR:
Wednesday, October 12, 2022**

Plaintiff Sustainable Fiber Technologies LLC (“Plaintiff”) and defendants Darby Kreitz, Allnorth Consultants Ltd., Allnorth Americas Inc., Red Leaf Fibre Ltd., and Red Leaf Pulp, Ltd. (collectively, “Defendants”; Plaintiff and Defendants, collectively, the “Parties”), by and through their counsel of record, respectfully submit this Stipulation—and respectfully request that the Court enter the subjoined proposed order—for a second extension of the time for Defendants to respond to Plaintiff’s Complaint.

1 1. WHEREAS, on June 12, 2022, Plaintiff filed the Complaint against Defendants in
2 the above-captioned action [Dkt. No. 1].

3 2. WHEREAS, on July 22, 2022, Defendants signed a Waiver of the Service of
4 Summons [Dkt. No. 9].

5 3. WHEREAS, on September 20, 2022, the Court granted the Parties' Stipulation and
6 Order to Extend Time for Defendants to Respond to Plaintiff's Complaint [Dkt. No. 15].

7 4. WHEREAS, Defendants' response to Plaintiff's Complaint is due on October 19,
8 2022.

9 5. WHEREAS, the Parties have been working cooperatively regarding the early stages
10 of the litigation and continue to be engaged in substantial discussions of the matters at issue in this
11 dispute.

12 6. WHEREAS, pursuant to the Parties' cooperation and discussions, the Parties
13 participated in a full-day mediation session on September 22, 2022, and their mediation efforts
14 remain ongoing.

15 7. WHEREAS, the Parties believe a 44-day extension of Defendants' deadline to
16 respond to the Complaint will further facilitate the Parties' mediation efforts and discussions.

17 8. WHEREAS, the requested extension is made in good faith and not for the purpose
18 of delay or other procedural advantage.

19 9. ACCORDINGLY, the Parties stipulate and respectfully request to extend
20 Defendants' deadline to respond to Plaintiff's Complaint to December 2, 2022. A proposed order
21 is subjoined herewith.
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IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD, on this 12th day of October, 2022.

BUCHALTER

s/ Bradley P. Thoreson

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s/ Jeffrey R. Kaatz

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Attorneys for Defendants

ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED. Defendants' deadline to respond to Plaintiff's Complaint is extended to December 2, 2022.

DATED: October 19, 2022



THE HONORABLE MARSHA J. PECHMAN
United States District Court Judge

Presented by:
BUCHALTER

s/ Bradley P. Thoreson
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s/ Jeffrey R. Kaatz
Jeffrey R. Kaatz, WSBA No. 49709

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